

Delaware Air Quality Management

2011 - 2015

Air Toxics Strategic Plan

Delaware
Air Quality Management
2011 – 2015 Air Toxics Strategic Plan

The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by the Division of Air Quality and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics. The 2011 - 2015 ATSP, finalized on December 28, 2010, is organized within the following strategic components.

- **Implement an on-going program to address the risks from exposure to air toxics**
- **Build a greater understanding of ambient air toxics environment**
- **Identify potential harm from exposure to air toxics**
- **Gather information related to air toxics sources**
- **Identify options for reducing air toxics in the environment**
- **Implement appropriate actions to reduce the harm from exposure to air toxics**
- **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**
- **Enhance DAQ air toxics resources**

2011

2011 - 2015 Air Toxics Strategic Plan

Year 2011

Implement an on-going program to address the risks from exposure to air toxic	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2010 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2010 Air Toxics Strategic Plan by 3/31/11.
c.	Review status and complete mid-year status report on the 2011 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2011 Air Toxics Strategic Plan by 9/30/11.
e.	Updating of the Air Toxics Strategic Plan for 2012-2016
i.	Review and revise, if needed, Air Toxics Area Source Program and timing, as part of the 2012 Air Toxics Strategic Plan by 10/11.
ii.	Coordinate development of the 2012 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2012-2016.
iv.	Update and finalize 2012 Air Toxics Strategic Plan for years 2012 to 2016 by 12/31/11.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.
5.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
a.	Complete Regulatory Timeline and Guidance documentation by 3/11.
6.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
7.	Review and revise, if needed, air toxics area source activities and timing as part of the 2012 Air Toxics Strategic Plan by 12/11.
8.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

2011 - 2015 Air Toxics Strategic Plan

Year 2011

Build greater understanding of ambient air toxics environment	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which provides meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to operate the gas chromatographic mass spectrometer to quantify "Community Air Toxics".
f.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
g.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance.
h.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

Year 2011

Identify potential harm from exposure to air toxics	
1.	Characterize the cancer and non-cancer risks associated with 2005 National Air Toxics Assessment (2005 NATA).
a.	Review 2005 NATA findings and assess potential impact of dry cleaning and gasoline distribution air toxics on the public's health, as needed.
b.	Complete evaluation of the 2005 NATA results, communicate findings, if warranted, and respond to inquiries, as appropriate.
c.	Review communication materials associated with the release of EPA's NATA 2005 results for Delaware, as needed.
2.	Characterize the cancer and non-cancer risks through future air toxics assessment programs.
a.	Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.
3.	Provide modeling support to Air Quality's Community Air Toxics Study (CATS), pending the completion of the CATS.
4.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
5.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern.
i.	Contribution of mobile sources, as resources become available.
ii.	Diesel particulate matter, as resources become available.
iii.	Residential wood stoves, as resources become available.

2011 - 2015 Air Toxics Strategic Plan

Year 2011

Gather information related to air toxics sources	
1.	Develop emissions inventory protocol for the implementation of the 2011 NEI, if needed.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	By 12/11, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
4.	Identify the miscellaneous parts and products manufacturing facilities that are subject to the area source paint stripping (1138 Sect 13) and area source surface coating (1138 Sect 14) requirements in Regulation 1138. a. Provide compliance guidance to known and probable affected sources for their self-determination of applicability by 3/11. b. Perform an applicability assessment at known and probable affected sources to determine those facilities that are subject to Section 13 and/or Section 14 by 6/11.
5.	Until data entry problems with AFS (via DENs) are resolved, continue to improve the consolidated source data base by entering all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2011.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.
8.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.

2011 - 2015 Air Toxics Strategic Plan

Year 2011

Identify options for reducing air toxics in the environment	
1.	Continue to monitor federal activities associated with the new Lead NAAQS and communicate any EPA proposed actions/decisions impacting Delaware.
2.	Provide technical assistance on lightering operations to DAQ and Ozone Transport Commission, as needed.
3.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
c.	Reevaluate the "Smoking Vehicle Reduction Program" options.
i.	Complete baseline testing of smoking vehicles program.
ii.	Review baseline testing results and identify funding of program, if implementation is warranted.
4.	Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
5.	Continue working with EPA R3 and the Clean Air Council on an outreach program for the Delaware Diesel Difference initiative.
6.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
7.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
i.	Electric Generating Unit MACT Standard.
b.	Newly proposed federal residual risk standards.
i.	Aerospace Manufacturing and Rework Facilities (Sub GG).
ii.	Secondary Aluminum Production (Sub RRR).
8.	Participate in development of the rulemaking strategy for
a.	Reevaluate and develop path forward for amending Regulation 1131, which would expand the low enhanced inspection and maintenance (I/M) program statewide by 6/11.
b.	Area standard applicable to gasoline dispensing facilities (Federal Sub CCCCCC), if needed.
9.	Implement other air toxics-related communications and outreach programs.
a.	Continue to participate in Claymont Coalition meetings.
b.	Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.
10.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Work with and promote open communications with other branches, divisions and Department on energy efficiency/conservation opportunities and pursue funding opportunities for projects.
11.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.
12.	Continue to participate in the multi-state Transportation & Climate Initiative (TCI).

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Year 2011

Implement appropriate actions to reduce the harm from exposure to air toxics	
1.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2010-11 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2010-11 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2010-11 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2010-11 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2010-11 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2010-11 timeframe.
vii.	The two (2) plating and polishing facility, subject to 1138 Sect 10, covered during the 2010-11 timeframe.
viii.	The one (1) source, subject to electric arc furnace (Federal Sub YYYYY), covered during the 2010-11 timeframe.
c.	By 9/11, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2011; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform inspections at asbestos demolition sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Incorporated area source standard requirements during renewal or reopening of Title V permits for
1.	Claymont Steel to include the Electric Arc Furnace (Federal Sub YYYYY) requirements by 3/11.
2.	Miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements, if applicable.
iii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
h.	Continue discussions for additional reduction of multi-pollutants (incl. Hg) from EGUs under 25MW.

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Year 2011

Implement appropriate actions to reduce the harm from exposure to air toxics	
i.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
i.	Johnson Controls to include Lead Acid Battery Manufacturing Plant (1138 Sect 11) requirements by 6/11.
ii.	St. Francis Hospital to include Hospital Ethylene Oxide Sterilizers (1138 Sect 9) requirements by 6/11.
iii.	Industraplate to include Plating and Polishing Operations (1138 Sect 10) requirements by 12/11.
iv.	Standard Engineering to include Plating and Polishing Operations (1138 Sect 10) requirements by 12/11.
v.	Any new miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements, if applicable.
vi.	Existing Perchloroethylene Dry Cleaning facilities (1138 Sect 5) by 12/11.
vii.	New Perchloroethylene Dry Cleaning facilities (1138 Sect 5).
j.	Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for
i.	Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
2.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.
b.	Continue to support of the SmartWay Transport programs, as appropriate.
i.	Complete Smyrna Rest Stop Electrification project by 3/11.
ii.	Continue to monitor DelDOT's installation of the I-95 Service Plaza Electrification project.
iii.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Explore contribution of mobile source air toxics emissions to the health risk using existing information available from DATAS and/or NATA, when or if available.
d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
3.	Implement other air toxics-related communications and outreach programs.
a.	Continue to implement a diesel anti-idling educational program.
i.	Evaluate and revise anti-idling outreach programs, as needed.
ii.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
iii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
iv.	Explore for new audiences to expand the anti-idling outreach program.
v.	Participate with the Ozone Transportation Commission (OTC) in the development of an OTC non-road anti-idling model rule.
b.	Provide the DAQ's Community Air Toxics study team with communication/outreach options by 12/11.
c.	Continue to improve compliance with Delaware's open burning requirements.
i.	Continue to evaluate and update open burning information, such as the inclusion of Reg. 1119 requirements, on Delaware's open burning website and in Delaware's education materials.
ii.	Continue to educate the public on Delaware's open burning restrictions.
4.	Provide support to small businesses on air toxics related issues.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
a.	Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.
b.	Evaluate the initial phase redesign and develop path forward, if warranted, by 6/11.
c.	Continue to improve and enhance the content, ease of accessing, and information flow of DAQ's "Air Toxics" web site.

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Year 2011

Implement appropriate actions to reduce the harm from exposure to air toxics	
6.	Submit delegation package for
a.	Area standards applicable to Paint Stripping and Miscellaneous Surface Coating Operations (1138 Sects 13, 14 & 15) by 1Q/11.
b.	Area standard applicable to Asphalt Processing and Asphalt Roofing Products Manufacturing Operations (1138 Sect 16) by 1Q/11.
c.	Title V-related area source subject to the municipal solid waste landfill standard (Federal Sub AAAA) by 3/11.
d.	Title V-related area source subject to the hazardous waste combustor standard (Federal Sub EEE) by 3/11.
e.	Title V-related area source subject to the electric arc furnace standard (Federal Sub YYYYYY) by 3/11.
f.	Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 3Q/11.
g.	General Provisions (1138 Sect 3) by 4Q/11.
7.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Assist in initial stringency determination between Federal Sub CCCCCC vs. existing Delaware regulations.
b.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 1Q/11.
ii.	Adopting the area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 1Q/11.
iii.	Amending the General Provisions (1138 Sect 3) by 1Q/11.
iv.	Amending the Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 1Q/11.
v.	Adopting the area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB) by 2Q/11.
vi.	Adopting the area standard applicable to Chemical Manufacturing Operations (Federal Sub VVVVVV) by 4Q/11.
vii.	Amending Regulation 1140 by incorporating CAL-LEV III requirements by 12/11.
c.	Complete stringency determinations for
i.	Hazardous Waste Combustor (Federal Sub EEE) requirements in current DuPont X Station Title V permit by 3/11.
ii.	Electric Arc Furnace (Federal Sub YYYYYY) requirements during renewal of Claymont Steel Title V permit by 3/11.
iii.	Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 2Q/11.
iv.	General Provisions (1138 Sect 3) by 2Q/11.
v.	Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 2Q/11.
vi.	Area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 3Q/11.
vii.	Area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 3Q/11.
viii.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB) by 4Q/11.
d.	Finalize the adoption of area source standards for
i.	Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 3Q/11.
ii.	General Provisions (1138 Sect 3) by 3Q/11.
iii.	Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 3Q/11.
iv.	Area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 4Q/11.
v.	Area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 4Q/11.
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward to amend 1138 Sect 6, if the Chrome Plating residual risk requirements are finalized in 2011.
ii.	Develop path forward, if the Federal Area Source Industrial, Commercial and Institutional Boiler standard is finalized in 2011.

2011 - 2015 Air Toxics Strategic Plan

Year 2011

Implement appropriate actions to reduce the harm from exposure to air toxics	
f.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Develop regulatory path forward for Gasoline Distribution Operations (Federal Sub BBBBBB) by 3/10, if necessary.
ii.	Develop regulatory path forward for Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 3/10, if necessary.
g.	As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
h.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
i.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/11, if required.
ii.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
iii.	Update the Area Source Program – Implementation Plan, as needed.
i.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
8.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
9.	Develop and implement improvements for inspection and maintenance (I/M) reporting process.
10.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
i.	Complete City of Newark truck retrofits by 6/11.
ii.	Complete additional school bus and government truck retrofits using 2010 DERA grant funding by 12/11.
b.	Complete Port of Wilmington engine replacement project.
11.	Continue to work with other State agencies on air toxics communications and outreaches.
12.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
13.	Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
14.	Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility – SEU.
15.	Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.
16.	Continue to identify and implement state facilities energy programs.
17.	Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
a.	Green Energy Program
i.	Photovoltaic Electric
ii.	Solar Hot Water
iii.	Geothermal
iv.	Wind
b.	Initiate financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).
c.	Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.
d.	Renewable Portfolio Goals

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Year 2011

Implement appropriate actions to reduce the harm from exposure to air toxics	
18.	Continue to identify and implement transportation programs. Transportation programs include:
a.	Clean State Program – focusing on greater use of alternative transportation fuels.
19.	Implement the “Energy Assurance Updates” by providing enhanced training for emergency personnel who respond during major disruptions to the energy supply.
20.	Implement the “Energy Efficiency and Conservation Block Grant” programs to reduce fossil fuel emissions, total energy use, and improve transportation efficiency.
21.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

Year 2011

Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

Year 2011

Air toxics resource development	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.

2012

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Implement an on-going program to address the risks from exposure to air toxic	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2011 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2011 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2012 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2012 Air Toxics Strategic Plan.
e.	Updating of the Air Toxics Strategic Plan for 2013-2017
i.	Review and revise, if needed, Air Toxics Area Source Program and timing, as part of the 2013 Air Toxics Strategic Plan by 10/12.
ii.	Coordinate development of the 2013 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2013-2017.
iv.	Update and finalize 2013 Air Toxics Strategic Plan for years 2013 to 2017.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.
5.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
6.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
7.	Review and revise, if needed, air toxics area source activities and timing as part of the 2013 Air Toxics Strategic Plan by 12/12.
8.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

Year 2012

Build greater understanding of ambient air toxics environment	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue and complete the "Community Air Toxics" project.
f.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
g.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
h.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

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Year 2012

Identify potential harm from exposure to air toxics

1. Prepare Delaware specific communication materials associated with the release of EPA's NATA 2005 results, if needed.
2. Provide modeling support to Air Quality's Community Air Toxics Study (CATS), pending the completion of the CATS.
3. Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
4. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
 - a. Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
 - b. Continue source apportionment analysis focusing on the air toxics of concern.
 - i. Contribution of mobile sources, as resources become available.
 - ii. Diesel particulate matter, as resources become available.
 - iii. Residential wood stoves, as resources become available.
5. Characterize the cancer and non-cancer risks through future air toxics assessment programs.
 - a. Coordinate ongoing risk assessment support and guidance of DPH for air toxics risk reduction activities.

Year 2012

Gather information related to air toxics sources

1. Develop and submit the 2011 NEI for HAPs by 12/31/12.
2. Provide emissions inventory support to the air toxics education and reduction programs, as required.
3. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
4. By 12/12, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5. Until data entry problems with AFS (via DENs) are resolved, continue to improve the consolidated source data base by entering all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2012.
7. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Identify options for reducing air toxics in the environment	
1.	Continue to monitor federal activities associated with the new Lead NAAQS and communicate any EPA proposed actions/decisions impacting Delaware.
2.	Provide technical assistance on lightering operations to DAQ and Ozone Transport Commission, as needed.
3.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
4.	Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
5.	Continue working with EPA R3 and the Clean Air Council on an outreach program for the Delaware Diesel Difference initiative.
6.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
7.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
8.	Implement other air toxics-related communications and outreach programs.
a.	Continue to participate in Claymont Coalition meetings.
b.	Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.
9.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Work with and promote open communications with other branches, divisions and Department on energy efficiency/conservation opportunities and pursue funding opportunities for projects.
10.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.
11.	Identify Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Implement appropriate actions to reduce the harm from exposure to air toxics	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.
b.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Identify and evaluate the risk reductions and funding needs of optional paths forward to reduce the public health risk from mobile source air toxics emissions based on evaluation of existing information available from DATAS and/or NATA, when or if available.
d.	Continue to identify and implement mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2010-11 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2010-11 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2010-11 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2010-11 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2010-11 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2010-11 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYY), covered during the 2010-11 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during 2011.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2012-13 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2012-13 timeframe.
c.	By 9/12, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124 or Federal Sub CCCCCC, whichever is applicable.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124 or Federal Sub CCCCCC, whichever is applicable, during 2012; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform compliance evaluations at asbestos demolition sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Implement appropriate actions to reduce the harm from exposure to air toxics	
h.	Incorporated area source standard requirements during renewal or reopening of Title V permits, including
i.	Miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements, if applicable.
i.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
i.	New and existing miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements.
ii.	New facilities subject to Prepared Feed Operations (Federal Sub DDDDDDD) requirements.
iii.	New facilities subject to Gasoline Distribution Operations (Federal Sub BBBB) requirements.
iv.	IKO to include Asphalt Processing and Asphalt Roofing Products Manufacturing Operations (1138 Sect 16) requirements.
v.	Cermet Materials to include Halogenated Solvent Cleaning System (1138 Sect 8) residual risk requirements.
vi.	Sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
vii.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
viii.	Existing sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15) and complete initial issuances by 12/12.
ix.	Sources subject to the Gasoline Dispensing Facilities standard (Federal Sub CCCCCC) requirements, if needed.
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
iii.	Broaden the anti-idling outreach program to newly identified audiences.
iv.	Participate with the Ozone Transportation Commission (OTC) in the development of an OTC non-road anti-idling model rule.
b.	Working with the DAQ's Community Air Toxics study team, implement communication program, if appropriate.
c.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
d.	Continue to improve compliance with Delaware's open burning requirements by educating the public on Delaware's open burning restrictions.
e.	Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
a.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/12, if required.
b.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
c.	Update the Area Source Program – Implementation Plan, as needed.
7.	Submit delegation package for
a.	Area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 1Q/12.
b.	Area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 1Q/12.
c.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB) by 1Q/12.
d.	Area standard applicable to Chemical Manufacturing Operations (Federal Sub VVVVVV) by 4Q/12.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Implement appropriate actions to reduce the harm from exposure to air toxics	
8.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ) by 3Q/12.
b.	Complete stringency determinations for
i.	Area standard applicable to Chemical Manufacturing Operations (Federal Sub VVVVVV) by 2Q/12.
c.	Finalize the adoption of area source standards for
i.	Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB) by 1Q/12.
ii.	Area standard applicable to Chemical Manufacturing Operations (Federal Sub VVVVVV) by 3Q/12.
d.	Finalize amendment of Regulation 1140 by incorporating CAL-LEV III requirements.
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward, if the Federal Electric Generating Unit MACT standard is finalized in 2012.
ii.	Develop path forward for applicable area source MACT standards finalized in 2012.
iii.	Develop path forward for applicable area source residual risk standards finalized in 2012.
1.	Develop path forward to amend 1138 Sect 12, if the Secondary Aluminum Production residual risk requirements are finalized in 2012.
f.	Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.
i.	Area standard applicable to Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ) by 2Q/12.
g.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
h.	As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
i.	Provide support to small businesses on air toxics related issues.
i.	Provide compliance assistance to gasoline distribution facilities during the implementation of a Delaware standard (Federal Sub BBBB).
ii.	Provide compliance assistance to gasoline dispensing facilities during the implementation of a Delaware standard (Federal Sub CCCCC).
iii.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
iv.	Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.
9.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
10.	Continue to improve the inspection and maintenance (I/M) program reporting process.
11.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
12.	Continue to work with other State agencies on air toxics communications and outreaches.
13.	Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility – SEU.
14.	Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Implement appropriate actions to reduce the harm from exposure to air toxics	
15.	Continue to identify and implement state facilities energy programs.
16.	Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
a.	Green Energy Program
i.	Photovoltaic Electric
ii.	Solar Hot Water
iii.	Geothermal
iv.	Wind
b.	Continue to implement financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).
c.	Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.
d.	Renewable Portfolio Goals
17.	Continue to identify and implement transportation programs. Transportation programs include:
a.	Clean State Program – focusing on greater use of alternative transportation fuels.
18.	Implement the “Energy Assurance Updates” by providing enhanced training for emergency personnel who respond during major disruptions to the energy supply.
19.	Implement the “Energy Efficiency and Conservation Block Grant” programs to reduce fossil fuel emissions, total energy use, and improve transportation efficiency.
20.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

Year 2012

Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

2011 - 2015 Air Toxics Strategic Plan

Year 2012

Air toxics resource development	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.

2013

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Implement an on-going program to address the risks from exposure to air toxic	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2012 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2012 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2013 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2013 Air Toxics Strategic Plan.
e.	Updating of the Air Toxics Strategic Plan for 2014-2018
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/13.
ii.	Coordinate development of the 2014 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2014-2018.
iv.	Update and finalize 2014 Air Toxics Strategic Plan for years 2014 to 2018.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.
5.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
6.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
7.	Review and revise, if needed, air toxics area source activities and timing as part of the 2014 Air Toxics Strategic Plan by 12/13.
8.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

Year 2013

Build greater understanding of ambient air toxics environment	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Identify potential harm from exposure to air toxics	
1.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
2.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

Year 2013

Gather information related to air toxics sources	
1.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3.	By 12/13, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
4.	By 12/13, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
5.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2013.
6.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

Year 2013

Identify options for reducing air toxics in the environment	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
6.	Implement other air toxics-related communications and outreach programs.
a.	Continue to participate in Claymont Coalition meetings.
b.	Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.
7.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Identify funding to implement Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
c.	Work with and promote open communications with other branches, divisions and Departments on energy efficiency/conservation opportunities and pursue funding opportunities for projects.
8.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Implement appropriate actions to reduce the harm from exposure to air toxics	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.
b.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Reduce the risk from mobile source air toxics emissions based on evaluation of existing information available from DATAS and NATA.
i.	Continue to identify and evaluate the risk reductions and funding needs of optional paths forward to reduce the public health risk from mobile source air toxics emissions based on evaluation of new information from DAQ and/or NATA.
ii.	Identify funding for preferred paths forward, to reduce the risk from mobile source air toxics based on evaluation of existing information available from DAQ and NATA.
d.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2012-13 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2012-13 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2012-13 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2012-13 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2012-13 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2012-13 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2012-13 timeframe.
viii.	The two (2) plating and polishing operations, subject to 1138 Sect 10, covered during the 2012-13 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2012-13 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2012-13 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2012-13 timeframe.
xii.	The three (3) gasoline distribution operations, subject to Federal Sub BBBB, covered during the 2012-13 timeframe.
c.	By 9/13, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124 or Federal Sub CCCCCC, whichever is applicable.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124 or Federal Sub CCCCCC, whichever is applicable, during 2013; total population is ~355 facilities.

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Implement appropriate actions to reduce the harm from exposure to air toxics	
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform compliance evaluations at asbestos demolition sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
1.	Camdel Metals to include Halogenated Solvent Cleaning System (1138 Sect 8) residual risk requirements.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
h.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
i.	New and existing facilities subject to Prepared Feed Operations (Federal Sub DDDDDDD) requirements.
ii.	New and existing facilities subject to Gasoline Distribution Operations (Federal Sub BBBBBD) requirements.
iii.	New facilities subject to Chemical Manufacturing Operations (Federal Sub VVVVVV) requirements.
iv.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
v.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
c.	Continue to improve compliance with Delaware's open burning requirement by educating the public on Delaware's open burning restrictions.
d.	Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
a.	Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/13, if required.
b.	Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.
c.	Update the Area Source Program – Implementation Plan, as needed.
7.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Chemical Preparations Industry (Federal Sub BBBBBD).
ii.	Adopting the area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
b.	Complete stringency determinations for
i.	Area standard applicable to Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ).
ii.	Area standard applicable to Chemical Preparations Industry (Federal Sub BBBBBD).

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Implement appropriate actions to reduce the harm from exposure to air toxics	
c.	Finalize the adoption of area source standards for
i.	Area standard applicable to Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ).
ii.	Area standard applicable to Chemical Preparations Industry (Federal Sub BBBB BBB).
d.	Submit delegation package for
i.	Area standard applicable to Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ).
ii.	Area standard applicable to Chemical Preparations Industry (Federal Sub BBBB BBB).
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2013.
ii.	Develop path forward for applicable area source residual risk standards finalized in 2013.
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
9.	As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
10.	Provide support to Small Businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
b.	Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.
11.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
12.	Continue to improve the inspection and maintenance (I/M) program reporting process.
13.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
14.	Continue to work with other State agencies on air toxics communications and outreaches.
15.	Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility – SEU.
16.	Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.
17.	Continue to identify and implement state facilities energy programs. State facilities energy programs include:
a.	Electricity Procurement
18.	Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
a.	Green Energy Program
i.	Photovoltaic Electric
ii.	Solar Hot Water
iii.	Geothermal
iv.	Wind
b.	Continue to implement financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).
c.	Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.
d.	Renewable Portfolio Goals
19.	Continue to identify and implement transportation programs. Transportation programs include:
a.	Clean State Program – focusing on greater use of alternative transportation fuels.

2011 - 2015 Air Toxics Strategic Plan

Year 2013

Implement appropriate actions to reduce the harm from exposure to air toxics

20. Continue to provide air toxics-related support to State through. . .

- a. Reviewing of air permits.
- b. Providing current regulatory interpretations.
- c. Advising on likely future trends and actions.
- d. Providing technical support, as needed.

Year 2013

Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics

1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

Year 2013

Air toxics resource development

1. Evaluate available training and encourage broader participation in risk-related training.
 - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
 - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
 - c. Evaluate the need for air toxics-related training for staff and present, as needed.
 - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3. Develop and implement mechanisms to improve air toxics communications.
 - a. Continue to implement newly found mechanisms to improve air toxics communications between branches.
 - b. Continue to promote open communications between DNREC and small businesses on air toxics issues.

2014

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Implement an on-going program to address the risks from exposure to air toxic	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2013 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2013 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2014 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2014 Air Toxics Strategic Plan.
e.	Updating of the Air Toxics Strategic Plan for 2015-2019
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2014 Air Toxics Strategic Plan by 10/14.
ii.	Coordinate development of the 2015 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2015-2019.
iv.	Update and finalize 2015 Air Toxics Strategic Plan for years 2015 to 2019.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.
5.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
6.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
7.	Review and revise, if needed, air toxics area source activities and timing as part of the 2015 Air Toxics Strategic Plan by 12/14.
8.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

Year 2014

Build greater understanding of ambient air toxics environment	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Identify potential harm from exposure to air toxics	
1.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
2.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

Year 2014

Gather information related to air toxics sources	
1.	Develop emissions inventory protocol for the implementation of the 2014 NEI, if needed.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
4.	By 12/14, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5.	By 12/14, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2014.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

Year 2014

Identify options for reducing air toxics in the environment	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
6.	Implement other air toxics-related communications and outreach programs.
a.	Continue to participate in Claymont Coalition meetings.
b.	Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.
7.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Pursue funding for preferred path forward to reduce the public health risk from mobile source air toxics emissions based on evaluation of recent information gathered from DAQ and/or NATA.
c.	Work with and promote open communications with other branches, divisions and Department on energy efficiency/conservation opportunities and pursue funding opportunities for projects.
8.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Implement appropriate actions to reduce the harm from exposure to air toxics	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.
b.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2012-13 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2012-13 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2012-13 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2012-13 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2012-13 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2012-13 timeframe.
vii.	The one (1) source, subject to electric arc furnace (Federal Sub YYYYY), covered during the 2012-13 timeframe.
viii.	The two (2) plating and polishing operations, subject to Federal Sub WWWWW, covered during the 2012-13 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2014-15 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2014-15 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2014-15 timeframe.
xii.	The three (3) gasoline distribution operations, subject to Federal SubBBBBB, covered during the 2014-15 timeframe.
xiii.	The chemical manufacturing operations, subject to Federal Sub VVVVVV, covered during the 2014-15 timeframe.
c.	By 9/14, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124 or Federal Sub CCCCCC, whichever is applicable.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124 or Federal Sub CCCCCC, whichever is applicable, during 2014; total population is ~355 facilities.
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform compliance evaluations at asbestos demolition sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors and professional service firms on the proper removal and disposal of asbestos.

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Implement appropriate actions to reduce the harm from exposure to air toxics	
g.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
iii.	Incorporate area source standard requirements into natural and synthetic minor source permits, including
1.	New and existing facilities subject to Chemical Manufacturing Operations (Federal Sub VVVVVV) requirements.
2.	New sources subject to area source Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ) requirements.
3.	New facilities subject to area source Chemical Preparations Industry (Federal Sub BBBB) requirements.
h.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for
i.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
ii.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
c.	Continue to improve compliance with Delaware's open burning requirement by educating the public on Delaware's open burning restrictions.
d.	Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
7.	Adopt new and amend existing air toxics regulations for mobile and stationary sources.
a.	Complete stringency determinations for
i.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
b.	Finalize the adoption of area source standards for
i.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
c.	Submit delegation package for
i.	Area standard applicable to Paint and Allied Products Manufacturing (Federal Sub CCCCCC).
d.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2014.
ii.	Develop path forward for applicable area source residual risk standards finalized in 2014.
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
9.	As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Implement appropriate actions to reduce the harm from exposure to air toxics	
10.	Provide support to Small Businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
b.	Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.
11.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
12.	Continue to improve the inspection and maintenance (I/M) program reporting process.
13.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
b.	Facilitate Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
14.	Continue to work with other State agencies on air toxics communications and outreaches.
15.	Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility – SEU.
16.	Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.
17.	Continue to identify and implement state facilities energy programs.
18.	Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
a.	Green Energy Program
i.	Photovoltaic Electric
ii.	Solar Hot Water
iii.	Geothermal
iv.	Wind
b.	Continue to implement financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).
c.	Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.
d.	Renewable Portfolio Goals
19.	Continue to identify and implement transportation programs. Transportation programs include:
a.	Clean State Program – focusing on greater use of alternative transportation fuels.
20.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

Year 2014

Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics	
1.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3.	By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

2011 - 2015 Air Toxics Strategic Plan

Year 2014

Air toxics resource development	
1.	Evaluate available training and encourage broader participation in risk-related training.
a.	Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
b.	Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
c.	Evaluate the need for air toxics-related training for staff and present, as needed.
d.	Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2.	Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3.	Develop and implement mechanisms to improve air toxics communications.
a.	Continue to implement newly found mechanisms to improve air toxics communications between branches.
b.	Continue to promote open communications between DNREC and small businesses on air toxics issues.

2015

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Implement an on-going program to address the risks from exposure to air toxic	
1.	Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.
a.	Review status and complete year-end status report on the 2014 individual Strategic Plans.
b.	Track implementation and report year-end-status of the 2014 Air Toxics Strategic Plan.
c.	Review status and complete mid-year status report on the 2015 individual Strategic Plans.
d.	Track implementation and report mid-year status on the 2015 Air Toxics Strategic Plan.
e.	Updating of the Air Toxics Strategic Plan for 2016-2020
i.	Review and revise, if needed, air toxics area source program and timing, as part of the 2016 Air Toxics Strategic Plan by 10/15.
ii.	Coordinate development of the 2016 Air Toxics Strategic Plan.
iii.	Update individual Strategic Plans for 2016-2020.
iv.	Update and finalize 2016 Air Toxics Strategic Plan for years 2016 to 2020.
2.	Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.
3.	Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.
4.	Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.
5.	Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.
6.	Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.
7.	Review and revise, if needed, air toxics area source activities and timing as part of the 2016 Air Toxics Strategic Plan by 12/15.
8.	Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.

Year 2015

Build greater understanding of ambient air toxics environment	
1.	Determine ambient air toxics concentrations for selected HAPs in Delaware.
a.	Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
b.	Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.
c.	Continue to collaborate with University of Delaware on air toxics research and special projects.
d.	Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which will provide meteorological data to NOAA repository for potential use in air toxics modeling, etc.
e.	Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.
f.	Continue to support the gas chromatographic mass spectrometer platform operations and maintenance through additional monitoring activities.
g.	Undertake new or special monitoring needs that may surface.
2.	Provide air toxics modeling support to meet community and internal needs.

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Identify potential harm from exposure to air toxics	
1.	Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.
2.	Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.
a.	Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.
b.	Continue source apportionment analysis focusing on the air toxics of concern, as needed.

Year 2015

Gather information related to air toxics sources	
1.	Develop and submit the 2014 NEI for HAPs by 12/31/15.
2.	Provide emissions inventory support to the air toxics education and reduction programs, as required.
3.	Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
4.	By 12/15, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.
5.	By 12/15, identify and enter into AFS (via DENs) all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.
6.	Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2015.
7.	Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.

Year 2015

Identify options for reducing air toxics in the environment	
1.	Provide technical assistance on lightering operations to DAQ, as needed.
2.	Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.
a.	Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.
b.	Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.
3.	Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.
4.	Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.
5.	Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.
a.	Newly proposed amendments to federal air toxics and incinerator standards.
b.	Newly proposed federal residual risk standards.
6.	Implement other air toxics-related communications and outreach programs.
a.	Continue to participate in Claymont Coalition meetings.
b.	Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.
7.	Identify grant and funding opportunities.
a.	Facilitate the identification, preparation and submission for transportation-related grants or other funding.
b.	Work with and promote open communications with other branches, divisions and Department on energy efficiency/conservation opportunities and pursue funding opportunities for projects.
8.	Evaluate the need for the development of additional Source Category Permits to address air toxics issues.

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Implement appropriate actions to reduce the harm from exposure to air toxics	
1.	Promote the implementation of mobile source air toxics reduction initiatives/programs.
a.	Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.
b.	Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.
c.	Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.
2.	Insure continued or improved compliance of stationary sources.
a.	Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.
b.	Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:
i.	The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2014-15 timeframe.
ii.	The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2014-15 timeframe.
iii.	The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2014-15 timeframe.
iv.	The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2014-15 timeframe.
v.	The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2014-15 timeframe.
vi.	The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2014-15 timeframe.
vii.	The one (1) source, subject to electric arc furnace standard (Federal Sub YYYYYY), covered during the 2014-15 timeframe.
viii.	The two (2) plating and polishing operations, subject to Federal Sub WWWWWW, covered during the 2014-15 timeframe.
ix.	40% or ~10 miscellaneous parts and products surface coating facilities, subject to 1138 Sect 14, covered during the 2014-15 timeframe; total potential population is ~25 facilities.
x.	The one (1) asphalt processing and asphalt roofing products manufacturing operation, subject to 1138 Sect 16, covered during the 2014-15 timeframe.
xi.	The six (6) prepared feed operations, subject to Federal Sub DDDDDDD, covered during the 2014-15 timeframe.
xii.	The three (3) gasoline distribution operations, subject to Federal Sub BBBBBB, covered during the 2014-15 timeframe.
xiii.	The chemical manufacturing operations, subject to Federal Sub VVVVVV, covered during the 2014-15 timeframe.
xiv.	The two (2) gasoline distribution operations, subject to Federal Sub BBBBBB, covered during the 2012-13 timeframe.
c.	By 9/15, perform compliance evaluations (CE) at area air toxics sources as follows:
i.	25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.
ii.	25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11 and 1138 Sect 15; total population is ~160 facilities.
iii.	10% or ~60 gasoline delivery vessels; total population is ~600 facilities.
d.	Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124 or Federal Sub CCCCCC, whichever is applicable.
e.	Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124 or Federal Sub CCCCCC, whichever is applicable, during 2015; total population is ~355 facilities.

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Implement appropriate actions to reduce the harm from exposure to air toxics	
f.	Continue to implement the Asbestos Demolition/Renovation Program.
i.	Perform compliance evaluations at asbestos demolition sites.
ii.	Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).
iii.	Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.
g.	Incorporate updated MACT and Residual Risk requirements in air permits.
i.	Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.
ii.	Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.
h.	Continue to incorporate Area Source Standard requirements into natural minor source permits, as necessary, for
i.	New and existing sources subject to area source Stationary Reciprocating Internal Combustion Engines (Federal Sub ZZZZ) requirements.
ii.	New and existing facilities subject to area source Chemical Preparations Industry (Federal Sub BBBBBBB) requirements.
iii.	New facilities subject to Paint and Allied Products Manufacturing (Federal Sub CCCCCC) requirements.
iv.	New sources subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5).
v.	New sources subject to Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).
3.	Implement other air toxics-related communications and outreach programs
a.	Continue to implement a diesel anti-idling educational program.
i.	Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.
ii.	Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.
b.	Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.
c.	Continue to improve compliance with Delaware's open burning requirement by educating the public on Delaware's open burning restrictions.
d.	Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.
4.	Implement at least one new opportunity to increase small business awareness of actions that small businesses can take to reduce risk from exposure to air toxics including regulatory.
5.	Continue to enhance the value and use of the air toxics information on DAQ's web sites.
6.	Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.
7.	Implement Air Toxics Area Source Program
a.	Submit Start Action Notices for
i.	Adopting the area standard applicable to Nine Metal Fabricating and Finishing Operations (Federal Sub XXXXXX).
b.	Complete stringency determinations for
i.	Area standard applicable to Nine Metal Fabricating and Finishing Operations (Federal Sub XXXXXX).
c.	Finalize the adoption of area source standards for
i.	Area standard applicable to Nine Metal Fabricating and Finishing Operations (Federal Sub XXXXXX).

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Implement appropriate actions to reduce the harm from exposure to air toxics	
d.	Submit delegation package for
i.	Area standard applicable to Nine Metal Fabricating and Finishing Operations (Federal Sub XXXXXX).
e.	Revise existing and develop new control strategies, as needed.
i.	Develop path forward for applicable area source air toxics standards finalized in 2015.
ii.	Develop path forward for applicable area source residual risk standards finalized in 2015.
8.	As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.
9.	As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.
10.	Provide support to Small Businesses on air toxics related issues.
a.	Continue to provide compliance assistance to small business as DAQ continues to adopt new regulations applicable area sources.
b.	Continue to encourage new participation and to provide assistance to Delaware marinas in obtaining voluntary compliance certification under the Clean Marina program.
11.	Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.
12.	Continue to improve the inspection and maintenance (I/M) program reporting process.
13.	Facilitate the implementation of mobile source diesel emission reduction projects.
a.	Facilitate the implementation of diesel retrofits.
b.	Facilitate Delaware appropriate options under the multi-state Transportation & Climate Initiative (TCI) to reduce greenhouse gases and air toxics from the transportation sector.
c.	Facilitate implementation of the preferred path forward to reduce the public health risk from mobile source air toxics emissions based on evaluation of recent information gathered from DAQ and/or NATA.
14.	Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility – SEU.
15.	Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.
16.	Continue to identify and implement state facilities energy programs.
17.	Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:
a.	Green Energy Program
i.	Photovoltaic Electric
ii.	Solar Hot Water
iii.	Geothermal
iv.	Wind
b.	Continue to implement financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).
c.	Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.
d.	Renewable Portfolio Goals
18.	Continue to identify and implement transportation programs. Transportation programs include:
a.	Clean State Program – focusing on greater use of alternative transportation fuels.
19.	Continue to provide air toxics-related support to State through. . .
a.	Reviewing of air permits.
b.	Providing current regulatory interpretations.
c.	Advising on likely future trends and actions.
d.	Providing technical support, as needed.

2011 - 2015 Air Toxics Strategic Plan

Year 2015

Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics

1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.
2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.
3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.

Year 2015

Air toxics resource development

1. Evaluate available training and encourage broader participation in risk-related training.
 - a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.
 - b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.
 - c. Evaluate the need for air toxics-related training for staff and present, as needed.
 - d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.
2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.
3. Develop and implement mechanisms to improve air toxics communications.
 - a. Continue to implement newly found mechanisms to improve air toxics communications between branches.
 - b. Continue to promote open communications between DNREC and small businesses on air toxics issues.